

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

AMERICAN PATRIOT BRANDS, INC., URBAN
PHARMS, LLC, DJ & S PROPERTY #1, LLC, TSL
DISTRIBUTION, LLC, ROBERT Y. LEE, BRIAN
L. PALLAS, AND J. BERNARD RICE,

Defendants, and

PUERTO RICO ONE CORPORATION, CASTRO
BUSINESS ENTERPRISES, LLC, AND LEGION
ACCOUNTING SERVICES, INC.

Relief Defendants.

Case No. 3:23-cv-01124

**ORAL ARGUMENT
REQUESTED**

**DEFENDANTS' AND RELIEF DEFENDANTS' (I) MOTION TO TRANSFER, OR IN
THE ALTERNATIVE, MOTION TO DISMISS: (II) ALL CLAIMS RELATING TO
NON-PUERTO RICO TRANSACTIONS FOR LACK OF VENUE, AND (III) ALL
CLAIMS RELATING TO ALL TRANSACTIONS AND ALL DEFENDANTS AND
RELIEF DEFENDANTS**

Defendants American Patriot Brands, Inc. ("American Patriot Brands"), Urban Pharms, LLC ("Urban Pharms"), DJ & S Property #1, LLC ("DJ&S"), TSL Distribution, LLC ("TSL"), Robert Y. Lee ("Lee"), Brian L. Pallas ("Pallas"), and J. Bernard Rice ("Rice") and Relief Defendants Castro Business Enterprises, LLC ("Castro Business"), Puerto Rico One Corporation ("PR One"), and Legion Accounting Services, Inc. ("Legion") respectfully move to transfer this action in its entirety to the United States District Court for the Central District of California

pursuant to 28 U.S.C. § 1404(a);¹ or, in the alternative, Defendants and Relief Defendants move to dismiss all claims relating to non-Puerto Rico transactions for lack of venue pursuant to Federal Rule of Civil Procedure 12(b)(3) and 28 U.S.C. § 1406(a) and all claims relating to all transactions and all Defendants and Relief Defendants under Federal Rule of Civil Procedure 12(b)(6). Defendants' and Relief Defendants' arguments are set forth in the Memorandum of Law that accompanies this Motion. Defendants and Relief Defendants respectfully request oral argument on this matter.

Dated: June 1, 2023

Respectfully submitted,

By: /s/ Bradley J. Bondi

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Counsel for Defendants and Relief Defendant

Legion Accounting Services, Inc.

¹ Upon transfer to the United States District Court for the Central District of California, that Court should dismiss the SEC's Complaint for the reasons set forth in the accompanying Memorandum of Law.

By: /s/ Alfredo Fernández Martínez

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Corporation and Castro Business Enterprises, LLC*

CERTIFICATE OF SERVICE

I hereby certify that on June 1, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

/s/ Bradley J. Bondi